

Subject: FW: Depositions -- Amos Lawsuit
Date: Wednesday, May 3, 2023 at 1:28:08 PM Central Daylight Time
From: Lauren Irwin
To: Jonathan Street
Attachments: image001.png, image002.png, Notice of Depo Waggoner.pdf, Notice of Depo Johnson.pdf, Notice of Depo LeFevre.pdf, Notice of Depo Lopez.pdf, Notice of Depo DiCicco.pdf



From: Jonathan Street <street@eclaw.com>
Date: Monday, April 3, 2023 at 6:44 PM
To: Leslie Goff Sanders <lsanders@bartonesq.com>, Lauren Irwin <lauren@eclaw.com>, Emily <emily@eclaw.com>
Cc: Daniel Crowell <dcrowell@bartonesq.com>, Stephen C. Stovall <sstovall@bartonesq.com>
Subject: Re: Depositions -- Amos Lawsuit

Leslie-

Please find attached notices of depositions for 5 individuals. We plan on issuing at least 2 more notices one for Friday afternoon April 14th and Monday April 17th. We may have to issue some for Saturday April 15th as well.

We don't care to move the times around for each individual deponent and we don't mind changing the location either. However given your client wont agree to any extension on discovery and we still don't have everything from you the court ordered- we have no choice but to set them this way.

Right now we have them set as follows:

4/12 9 am- Lopez
4/12 2 pm- LeFevre
4/13 9 am- Johnson
4/13 2 pm- Waggoner
4/14 9 am- DiCicco
4/14 2 pm- reserved
4/15- reserved
4/17 9 am- 30(b)(6)
4/17 2 pm- reserved

Contact me should you have any questions.

Thanks

Jon

Jonathan A. Street | Managing Partner
Employment & Consumer Law Group

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From: Jonathan Street <street@eclaw.com>
Date: Monday, April 3, 2023 at 1:03 PM
To: Leslie Goff Sanders <lsanders@bartonesq.com>, Lauren Irwin <lauren@eclaw.com>
Cc: Daniel Crowell <dcrowell@bartonesq.com>
Subject: Re: Depositions -- Amos Lawsuit

Leslie-

Lets hold open the week before discovery ends for deposition of the Ramsey folks. We will send out notices in the next couple of days

Thanks

Jon

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From: Leslie Goff Sanders <lsanders@bartonesq.com>
Date: Wednesday, March 29, 2023 at 2:03 PM
To: Jonathan Street <street@eclaw.com>, Lauren Irwin <lauren@eclaw.com>
Cc: Daniel Crowell <dcrowell@bartonesq.com>
Subject: RE: Depositions -- Amos Lawsuit

Jon and Lauren – We are continuing to hold tomorrow and Friday for depositions. Do you intend to depose these witnesses tomorrow and Friday? Please let me know at your earliest convenience. As a reminder, JB Waggoners' wife is expected to have a baby on Monday so he will be unavailable for at least the two weeks after her delivery.

Leslie Goff Sanders

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From: Leslie Goff Sanders
Sent: Thursday, March 16, 2023 8:19 AM
To: Jonathan Street <street@eclaw.com>; Lauren Irwin <lauren@eclaw.com>
Cc: Daniel Crowell <dcrowell@bartonesq.com>
Subject: FW: Depositions -- Amos Lawsuit

Please see below the proposed deposition schedule. For the HRC, we are willing to provide a 30(b)(6) in the interest of time. As for Armando Lopez, are you asking to depose him in his individual capacity or continuation of the corporate 30(b)(6)?

3/30 – Armando Lopez – 9:00; Lara Johnson – 1:00
3/31 – Luke LeFevre and J.B. Waggoner (FYI – J.B. Waggoner’s wife is due to have a baby on 4/3. Should he be unavailable on 3/31, we will agree to schedule his deposition after the discovery deadline (if necessary) with the court’s approval which should not be an issue given the circumstances).
4/5 – David DiCicco (following the deposition of Melissa Amos)

In addition, we need to schedule a one-hour Zoom deposition of Brad Amos to cover the topics we reserved (namely damages). Also, you have provided a list of witnesses which you updated this week but you have not provided any of the information required by the discovery requests including a description of what they know about the case. Please provide that ASAP so that we can determine if we need to depose any of them. I will provide a more comprehensive list of your other discovery deficiencies but this one needs to be addressed by **tomorrow** so that we can subpoena the witnesses for deposition if necessary. Thanks.

Leslie Goff Sanders

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